

## Joki, Jennifer

---

**From:** Koch, Kristine <Koch.Kristine@epa.gov>  
**Sent:** Thursday, March 21, 2013 10:52 AM  
**To:** James McKenna; Gene Revelas  
**Cc:** Jennifer Woronets; Humphrey, Chip; Dawn.Sanders@portlandoregon.gov  
**Subject:** FW: Consistency in discussion about conveyance systems in the RI

Jim and Gene – see email from Dawn, below. I already made the change in section 3 that she has identified, but she also identified some text in sections 1 and 2. I'm fine with changing the term "private" to "non-municipal" – if you are good with that, then please make those changed in the appropriate sections. We'll keep to these terms in the future sections.

Thanks,

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
Seattle, Washington 98101-3140

(206)553-6705  
(206)553-0124 (fax)  
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

---

**From:** Sanders, Dawn [mailto:Dawn.Sanders@portlandoregon.gov]  
**Sent:** Wednesday, March 06, 2013 11:57 AM  
**To:** Koch, Kristine  
**Subject:** Consistency in discussion about conveyance systems in the RI

Kristine,

One EPA redline on Section 3 related to conveyance systems is not consistent with other portions of the RI and I wanted to make you aware of this (see below). Please note that the page numbers provided below are from the redline version provided to the LWG by EPA on February 21, 2013,

The RI submitted to the EPA defined two types of systems: municipal and non-municipal. Municipal systems are defined as City of Portland systems (first paragraph under "Municipal Conveyance Systems" page 3-104) Non-municipal systems are defined as "Non-municipal systems are either private or part of other public systems, such as Oregon Department of Transportation (ODOT) or the Port of Portland." (see first paragraph under Conveyance Systems, page 3-99).

The Heading of "Historical Non-Municipal Conveyance Systems" (page 3-114) was changed to "Private Conveyance Systems," yet the section describes some public conveyance systems (e.g., Port of Portland). To be consistent with the definition, I suggest the Heading get changed to "Non-Municipal Conveyance Systems".

I also took a look at Sections 1 and 2 to see if there were any other places where there were inconsistencies. There were a couple; in each of the cases below, "private" should be changed to "non-municipal" for consistency with the definitions in Section 3.

Under the first paragraph of Section 1.1.1 Site Description

"This segment of the Lower Reach contains a highly industrialized area known as Portland Harbor, which contains a multitude of facilities and both **private** and municipal outfalls"

The start of the 5th paragraph under 1.1.2 Site History

Numerous municipal and **private** outfalls, including storm drains and combined sewer overflows, are located along both shores of the LWR in the metropolitan area."

Under 2.1.4.2.10 Upstream/Downstream Surface and Subsurface Sediment Samples, end of the 3rd bullet on page 2-71

"Extensive information on **private** and municipal outfalls and upland drainage systems that contributed to the CSM, provided by the City of Portland, Oregon DEQ's Joint Source Control Investigations, the Columbia Regional Association of Governments (CRAG) studies, and individual upland site reports "

Thanks for your considerations on this.

Dawn Sanders  
City of Portland  
503.823.7263